

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MICHIGAN REPUBLICAN PARTY,
LAURA COX, TERRI LYNN LAND,
SAVINA ALEXANDRA ZOE MUCCI,
DORIAN THOMPSON, and HANK
VAUPEL,

Case No.:

Hon.

Plaintiffs,

v.

**PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

JOCELYN BENSON, in her official capacity
as Secretary of State,

ORAL ARGUMENT REQUESTED

Defendant.

Gary P. Gordon (P26290)
Jason T. Hanselman (P61813)
Scott A. Hughes (P75486)
Dykema Gossett PLLC
Counsel for Plaintiffs
201 Townsend Street, Suite 900
Lansing, MI 48933
(517) 374-9133
ggordon@dykema.com
jhanselman@dykema.com
shughes@dykema.com

Charles R. Spies (P83260)
Brian D. Shekell (P75327)
Clark Hill PLC
Counsel for Plaintiffs
500 Woodward Avenue
Detroit, MI 48226
(313) 965-8803
cspies@clarkhill.com
bshekell@clarkhill.com

Plaintiffs Michigan Republican Party, Laura Cox, Terri Lynn Land, Savina Alexandra Zoe Mucci, Dorian Thompson, and Hank Vaupel, by and through their counsel, Dykema Gossett PLLC and Clark Hill PLC, respectfully move this Court for a preliminary injunction as set forth below and for the reasons set forth in the accompanying Brief in Support of Plaintiffs' Motion for Preliminary Injunction. Fed. R. Civ. P. 65(a).

Because there are only legal questions at issue, Plaintiffs respectfully request that this Court consolidate the preliminary injunction hearing with the trial on the merits and rule on the merits in accordance with Fed. R. Civ. P. 65(a)(2).

Wherefore, Plaintiffs respectfully request that the Court grant their Motion and issue a preliminary injunction pending a decision on the merits of Plaintiffs' claims in this matter.

Respectfully submitted,

Dated: August 22, 2019

/s/ Gary P. Gordon

Gary P. Gordon (P26290)
Jason T. Hanselman (P61813)
Scott A. Hughes (P75486)
Dykema Gossett PLLC
Counsel for Plaintiffs
201 Townsend Street, Suite 900
Lansing, MI 48933
(517) 374-9133
ggordon@dykema.com
jhanselman@dykema.com
shughes@dykema.com

Charles R. Spies (P83260)
Brian D. Shekell (P75327)
Clark Hill PLC
Counsel for Plaintiffs
500 Woodward Avenue
Detroit, MI 48226
(313) 965-8803
cspies@clarkhill.com
bshekell@clarkhill.com